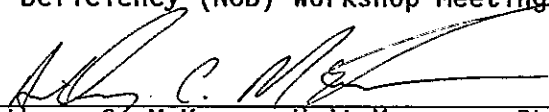


Meeting Minutes Transmittal

WASTE RECEIVING AND PROCESSING
Unit Managers Meeting/NOD Workshop
Federal Building, Room 251
Richland, Washington

March 28, 1996
7:30 a.m. to 12:00 p.m.

The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated Notice of Deficiency (NOD) Workshop Meeting.


Anthony C. McKarns, Unit Manager, RL Date: 4/30/96


Fenggang Ma, Unit Manager, Washington State Department of Ecology Date: 4/30/96

Waste Receiving and Processing Modules 1, 2A and 2B, WHC Concurrence


Bernadette A. Mayansik, Contractor Representative, WHC Date: 4-30-96

PURPOSE: Discuss permitting process and NOD Workshop.

Meeting Minutes are attached. Minutes are comprised of the following:

- Attachment 1 - Agenda
- Attachment 2 - Summary of Meeting Discussion and Commitments/Agreements
- Attachment 3 - Attendance List
- Attachment 4 - Action Items
- Attachment 5 - Project W-026, Waste Receiving and Processing Facility
Module 1 (WRAP 1)
- Attachment 6 - Waste Receiving and Processing Facility Module 1, Construction
Completion Checklist
- Attachment 7 - RL Letter, Change Request M-19



Attachment 1

**WASTE RECEIVING AND PROCESSING
Unit Managers Meeting/NOD Workshop
Federal Building, Room 251
Richland, Washington**

**March 28, 1996
7:30 a.m. to 12:00 p.m.**

AGENDA

WASTE RECEIVING AND PROCESSING

1. Approval of past UMM minutes (Ecology/RL/WHC)
2. Status of WRAP Module 1 schedule/design/construction (RL/WHC)
3. Status of WRAP Dangerous Waste Permit Modification (Ecology/RL/WHC)
4. Unit specific topics (Ecology/RL/WHC)
 - TPA Change Request for WRAP 2A M-19 Milestone
5. Workshop for Working Draft Chapters 2 and 4 (Ecology/RL/WHC)
6. Action items (Ecology/RL/WHC)
 - Previous action items
 - New action items
7. Set next meeting date (Ecology/RL/WHC)
 - Tentative dates
 - Proposed topics

Attachment 2

WASTE RECEIVING AND PROCESSING Unit Managers Meeting/NOD Workshop Federal Building, Room 251 Richland, Washington

**March 28, 1996
7:30 a.m. to 12:00 p.m.**

Summary of Discussion and Commitments/Agreements

1. Approval of past UMM minutes (Ecology/RL/WHC)

Two sets of past Unit Managers Meeting minutes were approved.

2. Status of WRAP Module 1 schedule/design/construction (RL/WHC)

Mr. J. Starkey (WHC) handed out a summary sheet (Attachment 5) of what lies ahead. He also handed out a construction completion checklist (Attachment 6). Mr. Starkey reported that all the gloveboxes were received and are in the facility except the TRU line empty drum compactor glovebox. The manipulators are nearly done, and initial testing has been done. The hoist installation is in progress. The finish work in the administrative area is nearly done and will be completed this week. The stretch wrapper was delivered and will be installed. The NDE equipment has arrived. The final piece of NDA equipment has arrived. The septic system is complete, and the O&M manual for the septic system was received and will be sent to the State. The HVAC balancing has been started.

Mr. Starkey said that due to late delivery of the gloveboxes, an internal construction milestone passed, and they are trying to recover from impacts. The date of the TPA milestone changed from March to the end of June. The contract completion date is now April 27, 1996. However, some of the testing will go beyond that date. There have been additional design change impacts that are currently being negotiated. Upcoming activities include completion of the administrative area, which is near completion. The empty drum compactor delivery date is a key element to the TRU line completion. It should be complete within the next two weeks. The ATP testing of the facility has begun.

Mr. Starkey indicated construction completion vs contract completion constitutes the elements identified in Attachment 6. The electrical system is complete. The HVAC system is complete. Mr. F. Ma (Ecology) asked if anything is anticipated further than the June date. Mr. Starkey said he did not believe so. He said all functional testing will be done well before the TPA milestone in June and actually believes it will be finished in April. Follow-on performance and acceptance testing will continue into

May and June. The ATPs are extensive and incorporate operational test functions in support of startup. Mr. D. Lucas (WHC) added that all the equipment will be tested by then.

Mr. Ma questioned whether ATPs were considered part of construction completion. Mr. Lucas responded that not for this project because ATPs constitute the bulk of OTPs that support startup of WRAP 1.

3. Status of WRAP Dangerous Waste Permit Modification (Ecology/RL/WHC)

Ms. G. Cummins (WHC) said that Chapters 2 and 4 will be discussed at the NOD Workshop immediately following the Unit Managers Meeting. The plan after the NOD Workshop is to send out a redline/strikeout copy of Chapters 2 and 4 and have clean chapters for the next meeting. In April, Chapter 3 and Appendix 3A will be worked on. Appendix 3A is a standalone supporting document. Ms. Cummins will send out Appendix 3A electronically and discuss it at the next workshop. Hopefully, everything will be complete by the end of July.

4. Unit specific topics (Ecology/RL/WHC)

- **TPA Change Request for WRAP 2A M-19 Milestone**

The TPA change request regarding the M-19 milestone (Attachment 7) has been sent to EPA and Ecology.

5. Workshop for Working Draft Chapters 2 and 4 (Ecology/RL/WHC)

Chapters 2 and 4 were revised during the NOD Workshop.

6. Action Items

- **Previous action items**

Ms. Cummins requested action item 11-20-95:1, "Provide a schedule by the next Unit Managers Meeting to meet notification requirements," be closed.

Ms. Cummins requested action item 11-20-95:2, "Contact Mr. R. Guercia (RL) regarding current status of the M-19 TPA change request," be closed.

- **New action items**

No new action items.

7. Set Next Meeting

- Tentative dates

The next UMM/NOD Workshop was tentatively scheduled for April 24,
7:30 a.m. to 12:00 p.m.

- Proposed topics

Chapter 3.

WASTE RECEIVING AND PROCESSING
Unit Managers Meeting/NOD Workshop
Federal Building, Room 251
Richland, Washington

Attendance List

[illegible]

Attachment 4

**WASTE RECEIVING AND PROCESSING
Unit Managers Meeting/NOD Workshop
Federal Building, Room 251
Richland, Washington**

**March 28, 1996
7:30 a.m. to 12:00 p.m.**

Action Items

<u>Action Item #</u>	<u>Description</u>
11-20-95:1	Provide a schedule by the next Unit Managers Meeting to meet notification requirements. ACTION: Mr. J. Starkey (WHC)/Mr. R. Bley (RL) CLOSED
11-20-95:2	Contact Mr. R. Guercia (RL) regarding current status of the M-19 TPA change request. ACTION: Mr. F. Ma (Ecology)/Mr. M. Jarayasi (Ecology) CLOSED

Attachment 5

**WASTE RECEIVING AND PROCESSING
Unit Managers Meeting/NOD Workshop
Federal Building, Room 251
Richland, Washington**

**March 28, 1996
7:30 a.m. to 12:00 p.m.**

**PROJECT W-026
WASTE RECEIVING AND PROCESSING FACILITY MODULE 1 (WRAP 1)**

PROJECT W-026
WASTE RECEIVING AND PROCESSING FACILITY MODULE 1 (WRAP 1)

Major Accomplishments

- Gloveboxes received and set with exception of the empty drum compactor.
- Manipulator and hoist installation in gloveboxes in process.
- Finish work (ceiling tile and floor covering) in admin. area proceeding.
- Stretch wrapper delivered.
- Automated Guided Vehicle installation and testing started.
- NDE equipment received set and testing initiated.
- NDA equipment received and set - last unit received week of 03/25/96.
- Septic system "Construction Report" and the "O&M" manual received.
- Preliminary HVAC balancing started.

Issues/Proposed Actions

- Contractor missed contract milestone for completion of shop testing of gloveboxes. Ripple affect being realized on follow on activities. Contractor has craft working extended hours. Management meetings occurring daily to assist in minimizing schedule slip.
- Design changes have impacted schedule. Changes necessary to verify equipment functionality are being prioritized. Some changes will not be implemented through the general contractor due to resource limitations/schedule impact. These changes will be implemented via alternate contracting means.

Upcoming Activities

- Complete admin. area finish work
- Complete fabrication, shop test, receive and set the empty drum compactor.
- Continue electrical terminations and utilities installation for gloveboxes.
- Initiate ATP testing on HVAC system, gloveboxes, NDA/NDE equipment, AGV and computer system.
- Continue system walkdowns and punchlist development.

Schedule Status

- Contractor current schedule reflects bulk of contract activities complete April with exception to testing and punchlist cleanup occurring during May and June.

Attachment 6

**WASTE RECEIVING AND PROCESSING
Unit Managers Meeting/NOD Workshop
Federal Building, Room 251
Richland, Washington**

**March 28, 1996
7:30 a.m. to 12:00 p.m.**

**WASTE RECEIVING AND PROCESSING FACILITY MODULE 1
CONSTRUCTION COMPLETION SCHEDULE**

Waste Receiving and Processing Facility Module 1
Construction Completion Checklist

System/Structure	Delivery Date	Scheduled Installation /Completion	Actual Installation /Completion	REMARKS
Building Structural Work	NA	2/1/95	COMPLETE	Landscaping and admin area working, TBC by 3/30
Electrical Distribution	6/12/95	8/15/95	COMPLETE	
Heating, Ventillation & Air Conditioning	8/30/95	6/1/95	COMPLETE except PROCESS AREA TBC 3/28	Working need to complete hookup to LLW and TRU gloveboxes.
LLW Process Glovebox	12/8/95	11/1/95	COMPLETE	
LLWRWM Process Glovebox	11/8/95	11/1/95	COMPLETE	
Automated Stacker/Retriever	8/1/95	7/13/95	COMPLETE	
Control Room		4/6/95 (3/30/96)	WORKING	SII has begun installing equipment and is on schedule to complete by 3/30.
One Gamma Energy Assay Unit	1/19/96	12/11/95	COMPLETE	
One Passive/Active Neutron Unit	1/12/96	12/11/95	COMPLETE	
One NDE (X-Ray) Unit	1/22/96	12/31/95	COMPLETE	

Attachment 7

**WASTE RECEIVING AND PROCESSING
Unit Managers Meeting/NOD Workshop
Federal Building, Room 251
Richland, Washington**

**March 28, 1996
7:30 a.m. to 12:00 p.m.**

RL LETTER, CHANGE REQUEST M-19



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

MAR 01 1995

96-SWT-036

Mr. Chuck Clarke
Regional Administrator
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, Washington 98101

Ms. Mary Riveland, Director
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Dear Mr. Clarke and Ms. Riveland:

CHANGE REQUEST M-19-95-01: "REVISE M-19 MILESTONES TO ALLOW FOR ALTERNATE TREATMENT AND DIRECT DISPOSAL OPTIONS FOR LOW-LEVEL MIXED WASTES"

Enclosed for your approval is Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Change Control Form M-19-95-01: "Revise M-19 Milestones to Allow for Alternate Treatment and Direct Disposal of Low-Level Mixed Wastes." This change request has been discussed extensively with the State of Washington, Department of Ecology staff and agreed to in draft form.

Should you have any questions regarding this matter, please feel free to call me on (509) 376-7395 or Mr. T. K. Teynor, of the Waste Programs Division, on (509) 376-1366.

Sincerely,

John D. Wagone
John D. Wagone
Manager

WPD:KDB

Enclosure

cc w/encl:
L. Arnold, WHC
W. Hamilton, Jr., WHC
M. Jaraysi, Ecology
D. Sherwood, EPA
R. Stanley, Ecology
M. Wilson, Ecology

Change Number M-19-95-01	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date December 20, 1995
Originator T. L. Baker		Phone (509) 376-5681
Class of Change <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title Revise M-19 Milestones to Allow for Alternate Treatment and Direct Disposal Options for Low Level Mixed Wastes		
Description/Justification of Change <p>This change request proposes an alternative to constructing and operating the WRAP 2A facility on the Hanford site. The revised strategy would employ several parallel paths to accomplish the WRAP 2A mission for treating Contact Handled Low Level Mixed Waste. The new milestones will require that waste treatment and/or direct disposal begin by the same date planned for WRAP 2A and continue at a rate that equals or exceeds the cumulative throughput previously planned for WRAP 2A. A new major milestone establishes this treatment/disposal rate as a requirement through Fiscal Year (FY) 2002.</p> <p>(continued)</p>		
Impact of Change <p>This change request creates a new major milestone (M-19-00) which sets specific requirements for treating and/or disposing of at least 1,644 cubic meters of Contact Handled Low Level Mixed Waste by the end of FY 2002. The previous major milestone, M-19-00, "Complete WRAP Module II Construction and Initiate Operations," due September 1999, is replaced by interim milestone M-19-01, which requires that treatment and/or direct disposal of waste be initiated by the same date, September 1999. The previous milestone M-19-01, "Complete WRAP Module II Construction," is deleted. Additional interim milestones and target dates are established for the treatment and disposal of Contact Handled Low Level Mixed Waste.</p>		
Affected Documents <p>Hanford Federal Facility Agreement and Consent Order, Fourth Amendment, January, 1994, Appendix D (Table D, pages D-41 and D-42, and Action Plan Work Schedule, page 13 of 40.)</p>		
Approvals <div style="display: flex; align-items: center;"> <div style="flex: 1;"> <small>Signature</small> </div> <div style="flex: 1; text-align: center;"> 3/1/96 <small>Date</small> </div> <div style="flex: 1;"> <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved </div> </div> <div style="margin-top: 10px;"> <div style="display: flex; align-items: center;"> <div style="flex: 1; border-bottom: 1px solid black; margin-bottom: 5px;"></div> <div style="flex: 1; text-align: center; margin-bottom: 5px;">Date</div> <div style="flex: 1;"> <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved </div> </div> <div style="display: flex; align-items: center;"> <div style="flex: 1; border-bottom: 1px solid black; margin-bottom: 5px;"></div> <div style="flex: 1; text-align: center; margin-bottom: 5px;">Date</div> <div style="flex: 1;"> <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved </div> </div> </div>		
EPA Ecology		

Description/Justification (cont.)

The new strategy will utilize a combination of several different approaches as described below:

1. Contracts with commercial firm(s) to provide stabilization of Contact Handled Low Level Mixed Waste (CH-LLMW) on a fixed unit price basis. These contracts will provide required treatment for all of the waste streams originally designated for WRAP 2A, except for four small waste streams which will constitute less than two percent of the CH-LLMW projected for treatment in WRAP 2A. These small streams will be treated on site using laboratory scale equipment per approach 2 and/or via a second commercial contract for treating high mercury subcategory waste as discussed in approach 4. Contracts will be maintained (extended or recompeted) until no longer needed to meet regulatory requirements. The stabilization contract will require that treatment begin during September 1999, and continue for a base period of five years with five optional one-year extensions.
2. Onsite treatment in WRAP 1, 2706-T or another permitted TSD facility using macro-encapsulation and/or a small scale deactivation/stabilization capability. Certain waste streams, such as radioactive elemental lead and debris, will require Ecology/EPA concurrence with macro-encapsulation using sealed polyethylene containers. However, the commercial contract option can be utilized for any or all of these waste streams if regulator concurrence is not obtained or the commercial approach is determined to be more cost effective.
3. Direct disposal of certain waste streams in compliance with applicable regulations, without any additional treatment. Three waste streams are candidates for this option. In each case additional sampling and analysis will be required to demonstrate that the streams meet LDR treatment requirements for disposal in the RMW landfill. Preliminary testing has shown that these streams, previously categorized as requiring additional treatment, will meet LDR treatment standards. One of the streams, 183 H Basin Solidified Liquids, will require a variance for trace amounts of formic acid. This variance was also planned in order to treat 183 H Basin wastes in the WRAP 2A facility. Any of these waste streams that are found unsuitable for direct disposal by the regulators will default to the commercial contract for treatment.
4. In addition, additional contracts may be let for treatment services for small quantities of waste not within the scope of the WRAP 2A project or for high mercury waste (discussed in approach 1) which is not included in the stabilization contract.

The revised M-19 milestones use the WRAP-2A treatment plan (Ref: WHC-SD-W100-RD-001 Rev-1, *Waste Receiving and Processing Module 2A, Feed Specification*, November 1994) as the basis for the type and volume of waste to be treated and/or disposed. This basis was used in the WRAP-2A requirements document (Ref: WHC-SD-W100-FDC-001 Rev-2, *Functional Design Criteria, Waste Receiving and Processing Facility Module 2A, Project W-100*, October 1993) to establish a treatment throughput rate of 822 cubic meters per year. Facility implementation plans called for operating at 30% of capacity in the first year (FY 2000), 70% in the second, and 100% thereafter. Thus, the revised milestones are based upon annual treatment and/or disposal rates of 246 cubic meters in FY 2000, 575 cubic meters in FY 2001, and 822 cubic meters for FY 2002 and beyond until compliance is reached with the RCRA storage time limitation for land disposal restricted waste. The treatment and/or disposal requirements are stated on a cumulative basis as shown in Milestone M-19-00 below.

Description/Justification (cont.)

This new strategy will be consistent with the site treatment planning approach prescribed by the Federal Facilities Compliance Act and with offsite generator Site Treatment Plans approved prior to October 6, 1995.

Revised Milestones

Delete existing Milestones M-19-00 and M-19-01 as follows:

M-19-00 Complete WRAP Module II Construction and Initiate Operations 9/30/1999

The WRAP Module II will include waste treatment capabilities to minimize land disposal of Low-Level Radioactive Waste and Radioactive Mixed Waste. The September 1999 completion date of WRAP Module II is critical to achieving compliance for the management of wastes that are prohibited from land disposal and extended storage. WRAP Module 2 will provide for treatment of secondary solid waste resulting from treated effluent disposal systems.

M-19-01 Complete WRAP Module II Construction 9/30/1998

Add revised Milestones M-19-00 and M-19-01 as follows:

M-19-00 Complete treatment/and or direct disposal of at least 1,644 cubic meters of Contact Handled Low Level Mixed Waste already in storage as of October 1, 1995 as well as newly generated Hanford Site low level mixed waste. September 2002

Cumulative treatment and/or direct disposal rates will be at least 246 cubic meters by the end of FY 2000, 822 cubic meters by the end of FY 2001, and 1,644 cubic meters by the end of FY 2002. These treatment/disposal rates are contingent upon Ecology/EPA approval of the variance from treatment standards for formic acid per M-19-02 below.

For the purpose of these M-19 series milestones, direct disposal of low-level mixed waste via use of the waivers and variances described below, will be considered equivalent to treatment.

M-19-01 Initiate Treatment of Contact Handled Low Level Mixed Wastes September 1999

Treatment of Contact Handled Low Level Mixed Waste will begin on or before September 30, 1999.

Additional Target Dates and Interim Milestones are established as follows:

M-19-01-T01 Complete the determination of the level of NEPA documentation that will be required for commercial treatment contractor(s). May 1999

M-19-01-T02 Award a commercial contract for stabilization of Contact Handled Low Level Mixed Waste. July 1999

M-19-01-T03 Complete all NEPA requirements related to the commercial contract for stabilization of Contact Handled Low Level Mixed Waste. September 1999

Description/Justification (cont.)

M-19-02 Obtain Ecology/EPA decision regarding acceptability of a treatment variance for 183H Basin formic acid waste.

September 199

M-19-02A Submit petition to Ecology/EPA for variance from treatment standards for formic acid.

April 199

Risk DEHS U

This treatment variance for trace amounts of formic acid is required for both commercial stabilization treatment of 183H sludge and crystalline solids, and direct disposal of 183H solidified liquids. The variance was also required and planned for the WRAP 2A project. If the treatment variance is not granted, the 183H waste stream will require thermal treatment prior to stabilization and/or disposal.

M-19-03 Complete sampling and analysis to determine if Backlog Soils meet LDR treatment standards and/or MTCA risk based concentrations.

December 199

If additional sampling and analysis demonstrates that backlog soils meet MTCA risk based concentrations, they will be disposed of in the non-regulated LLW landfill. If the soils fail MTCA risk based concentrations, but meet LDR treatment standards, they will be disposed in the RMW landfill. Otherwise, stabilization using the commercial contract will be required before disposing of the soils.

M-19-04 Obtain Ecology/EPA decision on the acceptability of the existing solidification treatment of 183H Solidified Liquids as LDR treatment.

December 199

M-19-04A Submit justification for accepting existing solidification treatment of 183H Solidified Liquids to Ecology/EPA.

July 199

Ongoing sampling and analysis of 183H Solidified Liquids indicates that the existing grouted waste form meets applicable RCRA stabilization treatment standards and all TCLP requirements. Additional sampling and analysis will be utilized to determine if the waste stream meets applicable standards for direct disposal in the RMW landfill.

Distribution:

L. D. Arnold	WHC	B2-35*
R. E. Bley	RL	A5-18
R. J. Bottenus	WHC	T3-01*
R. C. Bowman	WHC	H6-24*
T. A. Carlson	WHC	T3-28*
R. M. Carosino	RL	A4-52
M. Ciminera	GSSC	B1-42*
C. E. Clark	RL	A5-15*
G. D. Cummins	WHC	H6-24
R. J. Giroir	WHC	T4-05*
R. F. Guercia	RL	S7-55*
P. L. Hapke	WHC	T4-05*
K. L. Hladek	WHC	T4-02*
M. N. Jaraysi	EcoToxy	B5-18*
D. R. Lucas	WHC	G3-15*
F. Ma	EcoToxy	B5-18
P. J. Macbeth	GSSC	R3-82*
P. J. Mackey	WHC	B3-15
B. A. Mayancsik	WHC	T3-01
T. C. McKarns	RL	A5-52
M. A. McLaughlin	WHC	B2-35*
R. D. Pierce	WHC	T3-04
S. M. Price	WHC	H6-23*
J. G. Riddelle	WHC	T3-01*
A. R. Sherwood	WHC	H6-20
J. G. Starkey	WHC	G3-15
H. T. Tilden II	PNL	P7-79
J. L. Westcott	WHC	T3-04
J. K. Yerxa	RL	A7-75
RCRA Files	WHC	H6-23

*electronic copy

ADMINISTRATIVE RECORD: Waste Receiving and Processing TS-2-4 [Care of EDMC, WHC (H6-08)]

Washington State Department of Ecology, Nuclear And Mixed Waste Hanford Files,
P.O. Box 47600, Olympia, Washington 98504-7600

Environmental Protection Agency Region 10, Seattle, Washington 98101, Mail
Stop HW-070 (Records Center)

Please send comments on distribution list to G. D. Cummins, WHC (H6-24)
(509) 372-2484